

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 4:04cr
)	
v.)	18 U.S.C. § 1028 (f)
)	Conspiracy in Connection
LAMONT ISAAC CHRISTIAN)	with Identification
a/k/a "LA")	Documents
(Counts 1-24))	(Count 1)
)	
KEITH JOYCE)	18 U.S.C. §§ 1028(7) and 2
(Counts 1 & 13))	Identity Theft
)	(Count 2-12)
DEFENDANTS.)	
)	18 U.S.C. § 371
)	Conspiracy to Unlawfully Use
)	Social Security Numbers
)	(Counts 13)
)	
)	42 U.S.C. § 408 (a)(7)(B)
)	Unlawful Use of a Social
)	Security Number
)	(Count 14)
)	
)	18 U.S.C. §§ 1341 and 2
)	Mail Fraud
)	(Counts 15-24)
)	

INDICTMENT

June 2004 TERM - at Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about April 2001, through and including approximately August 2001, in Newport News, Virginia, within the Eastern District of Virginia, and elsewhere LAMONT ISAAC CHRISTIAN, and KEITH JOYCE the defendants herein, and Taisha Bivens, Brandon

Fieldings, Kelvin Fieldings, and others, did knowingly combine, confederate, conspire and agree together and with each other to commit the following offenses against the United States, that is:

a. To unlawfully and knowingly produce and transfer identification documents that is and appeared to be identification documents issued by and under the authority of the United States knowing that such documents were produced without lawful authority in violation of Title 18, United States Code, Section 1028 (a) (1) (b) (1) (A) (i) .

b. To knowingly possess an identification document that is and appears to be an identification document of the United States which was produced without lawful authority, knowing that such document was produced without such lawful authority in violation of Title 18, United States Code, Section 1028 (a) (6) .

c. To knowingly transfer and use, without lawful authority, a means of identification of another person with the intent to commit and to aid and abet unlawful activity that constitutes a violation of federal law and that constitutes a felony under applicable state law in violation of Title 18, United States Code, Section 1028 (a) (7) .

MANNER AND MEANS OF THE CONSPIRACY

2. The objects of the conspiracy were accomplished through the following manner and means, among others:

a. As part of the conspiracy LAMONT ISAAC CHRISTIAN and KEITH JOYCE and their coconspirators created, obtained, and attempted to obtain false military identification documents containing the names and personal identifying information for actual military service members, but bearing the pictures of LAMONT ISAAC CHRISTIAN, Kelvin Fieldings, KEITH JOYCE, Leon Burden, and others known and unknown to the Grand Jury.

b. It was further part of the conspiracy that LAMONT ISAAC CHRISTIAN and his coconspirators recruited others, including KEITH JOYCE, Leon Burden, and others known and unknown to the Grand Jury to pose as active military service members in order to obtain military identifications bearing the names of actual military service members.

c. It was further part of the conspiracy that LAMONT ISAAC CHRISTIAN and his coconspirators obtained an Alpha Roster containing the names of thousands of military members and their personal information including: Name, Rank, Social Security Number, date of birth, and address.

d. It was further part of the conspiracy that LAMONT ISAAC CHRISTIAN and his coconspirators used the false military identification documents to obtain lines of credit from various business establishments including Car Smart, Citi Financial Services, Kay Jewelers, Reed's Jewelry Store, SunCom (currently Triton PCS), JCPenney's, nTelos, JB Robinson Jewelers, Jewelry

Stores, Beneficial Financial, and American General Finance, in the names of military service members and to use those credit accounts to unlawfully obtain monies, goods, and services.

e. It was further part of the conspiracy that LAMONT ISAAC CHRISTIAN, Leon Burden, Kelvin Fieldings, and others known and unknown to the Grand Jury, used the identification information of others, including social security numbers of the actual military members and their credit histories in violation of federal law.

f. It was further part of the conspiracy that LAMONT ISAAC CHRISTIAN and his coconspirators utilized KEITH JOYCE, Leon Burden, and other known and unknown to the Grand Jury, to pose as military service members and display the fraudulent military identifications of the actual military service members to open fraudulent credit accounts in the names of those actual military service members, and obtain funds and merchandise for the benefit of the conspirators.

g. It was further part of the conspiracy that when applying for lines of credit, the conspirators would use the military members true current address to further mislead and induce the businesses to grant them lines of credit.

h. It was further part of the conspiracy that the defendant's false statements caused businesses to issue lines of credit to the defendants to the detriment of the credit of the military members. It was further part of the conspiracy that monthly statements, and

letters, and notifications were sent by the businesses to the military members true addresses.

(In violation of Title 18, United States Code, Section 1028(f)).

COUNT TWO - SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about, the dates set forth below, in the Eastern District of Virginia, LAMONT ISAAC CHRISTIAN, the defendant herein, knowingly used and caused to be used, without lawful authority, means of identification of another person, to wit, social security number 224-19-4469 assigned to another person by the Commissioner of Social Security Administration, with the intent to commit and to aid and abet a felony, that is, Unlawful Use of a False Social Number in violation of Title 42, United States Code, Section 408(a)(7)(B) with such use of means of identification in and affecting interstate commerce as follows:

<u>Count</u>	<u>Date</u>	<u>Business</u>	<u>Location</u>	Amount
2	37105	Helzberg Diamonds	Norfolk	\$2,000.00
3	37105	Beneficial Financial	Suffolk	\$4,000.62
4	37105	Wachovia Bank/Carsmart	Virginia Beach	\$35,995.00
5	37105	JC Penney Card	Newport News	\$920.05
6	37105	Joe's Tires (American General Finance)	Norfolk	\$2600.00
7	37112	nTelos	Newport News	\$2543.49

(All in violation of Title 18, United States Code, Section 1028(7) and 2).

COUNTS EIGHT - ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about, the dates set forth below, in the Eastern District of Virginia, LAMONT ISAAC CHRISTIAN, the defendant herein, knowingly used and caused to be used, without lawful authority, means of identification of another person, to wit, social security number 113-72-8110 assigned to another person by the Commissioner of Social Security Administration, with the intent to commit and to aid and abet a felony, that is, Unlawful Use of a False Social Number in violation of Title 42, United States Code, Section 408(a)(7)(B) with such use of means of identification in and affecting interstate commerce as follows:

<u>Count</u>	<u>Date</u>	<u>Business</u>	<u>Location</u>	<u>Amount</u>
8	37101	Kay Jewelers	Newport News	\$2190.32
9	37101	Citi Financial	Hampton	\$3774.47
10	37101	Triton PCS DBA	Hampton	\$ 320.64
11	37104	JC Penney Card	Newport News	\$ 312.82

(All in violation of Title 18, United States Code, Section 1028(7) and 2).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about, August 13, 2001, at Beneficial Financial in the Eastern District of Virginia, LAMONT ISAAC CHRISTIAN, the defendant herein, knowingly used and caused to be used, without lawful authority, means of identification of another person, to wit, social security number 079-60-7892 assigned to another person by the Commissioner of Social Security Administration, with the intent to commit and to aid and abet a felony, that is, Unlawful Use of a False Social Number in violation of Title 42, United States Code, Section 408(a)(7)(B) with such use of means of identification in and affecting interstate commerce.

(All in violation of Title 18, United States Code, Sections 1028(7) and 2).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

LAMONT ISAAC CHRISTIAN, and KEITH JOYCE the defendants herein, and Taisha Bivens, Brandon Fieldings, Kelvin Fieldings, and others, did knowingly combine, confederate, conspire and agree together and with each other to commit the following offenses against the United States, that is:

a. To with intent to deceive, knowingly and falsely represent Social Security numbers to be the Social Security Number assigned by the Commissioner of the Social Security Administration to members of the conspiracy, when in fact, as, the conspirators, then well knew, such number was not the Social Security Number assigned to him by the Commissioner of Social Security in violation Title 42, United States Code, Section 408(a)(7)(B).

OVERT ACTS

In furtherance of the conspiracy and to affect its objects, the following acts, among other, were committed in the Eastern District of Virginia and elsewhere:

1. On or about June 22, 2001, at Fort Monroe, Hampton, Virginia, coconspirator Kelvin Fieldings falsely represented to the Fort Monroe military identification card section that he was George Humphrey, IV, and falsely provided the social security number assigned to George Humphrey, IV, by the Commissioner of Social Security in order to obtain a military identification card in the

name of George Humphrey, IV, bearing the photograph of Kelvin Fieldings.

2. On or about June 2001, at Langley Air Force Base, Hampton, Virginia, LAMONT ISAAC CHRISTIAN falsely represented to the Langley Air Force Base identification card section that he was Kenneth Morsee, and falsely provided the social security number assigned to Kenneth Morsee by the Commissioner of Social Security in order to obtain a military identification card in the name of Kenneth Morsee, bearing the photograph of LAMONT ISAAC CHRISTIAN.

3. On or about August 13, 2001 at Langley Air Force Base, Hampton, Virginia, Leon Burden falsely represented to the Langley Air Force Base identification card section that he was Theron A. McClinton, and falsely provided the social security number assigned to Theron A. McClinton by the Commissioner of Social Security in order to obtain a military identification card in the name of Theron A. McClinton, bearing the photograph of Leon Burden.

4. On or about August 27, 2001 at Fort Monroe, Virginia, KEITH JOYCE falsely represented to the Fort Monroe identification card section that he was Robert S. White, and falsely provided the social security number assigned to Robert S. White by the Commissioner of Social Security in order to obtain a military identification card in the name of Robert S. White, bearing the photograph of KEITH JOYCE.

5. On or about August 3, 2001, LAMONT ISAAC CHRISTIAN, and an unknown coconspirator entered Joe's Tires and Rims located in Norfolk, Virginia.

(In violation of Title 18, United States Code, Section 371).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. LAMONT ISAAC CHRISTIAN, was assigned Social Security Number 091-62-1320 by the Commissioner of the Social Security Administration.

2. On or about June 2001, in Hampton, Virginia, within the Eastern District of Virginia, LAMONT ISAAC CHRISTIAN, the defendant herein, for the purpose of obtaining a military identification card from the United States Air Force, with intent to deceive, knowingly did falsely represent Social Security Number 291-76-2112 to be the Social Security Number assigned by the Commissioner of the Social Security Administration to him, when in fact, as, LAMONT ISAAC CHRISTIAN, then well knew, such number was not the Social Security Number assigned to him by the Commissioner of Social Security.

(All in violation Title 42, United States Code, Section 408(a) (7) (B) .

COUNTS FIFTEEN - TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations contained in Count One, paragraph two and all sub-parts thereof are hereby incorporated herein by reference as if set out in full.

2. On or about the dates set forth below, in the Eastern District of Virginia, LAMONT ISAAC CHRISTIAN, for the purpose of executing the scheme and artifice to defraud, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter, a letter containing monthly loan statements and correspondence relating to fraudulently obtained lines of credit secured by LAMONT ISAAC CHRISTIAN and his coconspirators as set forth below:

<u>COUNT</u>	<u>DATE</u>	<u>ITEM MAILED</u>	<u>FROM</u>	<u>TO</u>
15	37114	Statement of Account	Beneficial Financial	Issac S. Mitchell 207 Rockwood Place Suffolk VA 23435
16	37111	Loan Denial Notification	Wachovia Bank, N.A. 1451 Thomas Langston Rd Winterville NC 28590	Isaac S. Mitchell 207 Rockwood PL Suffolk VA 23435
17	37110	Refusal to Grant Credit	JB Robinson Jewelers Store #633 Credit Operations 375 Ghent Road Akron OH 44333	Isaac S. Mitchell 207 Rockwood PL Suffolk VA 23435
18	37109	Refusal to Grant Credit	Kay Jewelers Store 31886 Credit Operations 375 Ghent Road Akron OH 44333	Issac S. Mitchell 207 Rockwood PL Suffolk VA 23435

19	37115	Account Statement	JC Penney	Isaac S. Mitchell 207 Rockwood Place Suffolk VA 23435
20	37277	Account Statement	American General Finance Ste 5 5957 E Virginia Beach Blvd Norfolk VA 23502-2463	Issac S. Mitchell 207 Rockwood Dr Suffolk VA 23435
21	37234	Summary of Account	nTelos	Issac S. Mitchell 207 Rockwood Dr Suffolk VA 23435
22	37105	Account Statement	Kay Jewelers	Pernell E. Parker 113 Melbourne Ct Yorktown VA 23693
23	37104	Review of Loan Letter	CitiFinancial Customer Service	Purnell E. Parker 113 Melbourne Ct Yorktown VA 23693
24	37102	Welcome Letter	Triton PCS DBA SunCom	Purnell E. Parker 113 Melbourne Ct Yorktown VA 23693

(In violation of Title 18, United States Code, Sections 1341 and 2).

A TRUE BILL:

FOREPERSON

PAUL J. MCNULTY
UNITED STATES ATTORNEY

By:

Howard J. Zlotnick
Assistant United States Attorney
Fountain Plaza Three
721 Lakefront Commons, Suite 300
Newport News, VA 23606
(757) 591-4000